

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**LEON WEINGRAD**, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

vs.

**SYNERGY BPO LLC,**

*Defendant.*

Case No. 4:24-cv-00610

**DEFENDANT SYNERGY BPO LLC’S  
UNOPPOSED MOTION TO AMEND THE SCHEDULING ORDER**

Pursuant to Fed. R. Civ. P. 16(b)(4), Defendant Synergy BPO LLC (“Synergy” or “Defendant”) respectfully moves the Court to modify the Scheduling Order [Dkt 15] to continue all deadlines in this matter, aside from the deadline to join parties or amend pleadings, by a period of ninety (90) days. Plaintiff Leon Weingrad (“Plaintiff”) consents to the relief sought herein. In support of the motion, Defendant states as follows:

**FACTS**

1. This civil action commenced on June 28, 2024, when Plaintiff filed his Complaint. [Dkt 1].
2. On September 27, 2024, Defendant filed its Answer to Plaintiff’s Complaint. [Dkt 9].
3. On November 4, 2024, the Court entered a Scheduling Order, which set forth various deadlines for the disposition of the matter, including discovery, mediation, disclosures, and the filing of dispositive motions. [Dkt 15].

4. The parties have conferred regarding the requested modification of the Scheduling Order. The proposed modifications are agreed upon by both Plaintiff and Defendant.

**REQUEST FOR EXTENSION**

5. Paragraph 12 of the Scheduling Order provides that in order to modify the dates set forth therein, the requesting party must establish good cause as provided under Fed. R. Civ. P. 16(b)(4). *See* [Dkt 15]. Rule 16(b)(4) provides that "[a] schedule may be modified only for good cause and with the judge's consent."

6. Defendant respectfully submits that good cause exists to amend the Scheduling Order for the following reasons.

a. The parties have been diligently engaged in discovery, which remains ongoing as the parties attempt to resolve certain disputes their respective responses and corresponding productions. Defendant's representatives have been seeking documents and information from overseas entities to that end. The parties require additional time to complete discovery in order to utilize findings to identify and prepare expert designations. The parties have also been engaged in protracted settlement negotiations. These discussions are ongoing.

7. To allow the parties adequate time to complete discovery, prepare and submit comprehensive expert reports, including rebuttal reports if necessary, while continuing to continue negotiating a prospective resolution, the parties have agreed to the following proposed modifications to the Scheduling Order deadlines :

Motions for Leave to Join Parties or Amend Pleadings	January 3, 2025
Initial Expert Designation & Report	August 8, 2025
Responsive Expert Designation & Report	September 5, 2025

Rebuttal Expert Designation	30 days after the other party's disclosure
Expert Objections	December 8, 2025
Dispositive Motions	November 3, 2025
Mediation	September 1, 2025
Completion of Discovery	August 1, 2025
Pretrial Disclosures & Objections	January 22, 2026 (Objections due 14 days later)
Pretrial Materials	February 6, 2026
Exchange of Exhibits	February 17, 2026
Pretrial Conference	To be set if necessary
Trial Date	March 2, 2026

WHEREFORE, Defendant respectfully request an order modifying the Scheduling Order as proposed above.

Dated: April 23, 2025

Respectfully submitted,

**PERRONG LAW LLC**

**KLEIN MOYNIHAN TURCO LLP**

*Attorneys for Plaintiff*  
*Leon Weingrad*

*Attorneys for Defendant*  
*Synergy BPO, LLC*

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Leon Weingrad

Synergy BPO LLC

/s/ Leon Weingrad  
By: Leon Weingrad  
Title: Plaintiff

/s/ Mirza Jewel  
By: Mirza Jewel  
Title: Chief Executive Officer

**CERTIFICATE OF SERVICE**

I certify a true and correct copy of the foregoing was served upon all counsel of record via CM/ECF on April 23, 2025.

/s/ Daniel M. Chin  
Daniel M. Chin